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PRO SE PLAINTIFF

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

## **DRÉE ANN CELLEMME,**

) Case No. 2:16-cv-02539-JAD-CWH

Plaintiff,

V

## ) FIRST REQUEST

**MATTHEW G. WHITAKER**, Acting  
Attorney General, U.S. Department of  
Justice,

) **STIPULATION FOR  
EXTENSION OF TIME TO  
FILE DISCOVERY PLAN /  
SCHEDULING ORDER**

**Defendant.**

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COME NOW Plaintiff, Dr  e Ann Cellemme, and Defendant Matthew G. Whitaker<sup>1</sup>, Acting Attorney General, U.S. Department of Justice, and hereby stipulate and agree to a 60-day extension to file their Discovery Plan / Scheduling Order which is currently due on December 16, 2018. This is the parties' first extension request since the Court denied Defendant's motion to dismiss. Pursuant to the Order Denying Government's Motion to Dismiss (ECF. No. 62), the case was referred to the Pro Bono Liaison for the appointment of counsel for Plaintiff. The Pro Bono Liaison has been diligent in their efforts to obtain counsel on Plaintiff's behalf. However, they have been unable thus far to obtain counsel for Plaintiff. Therefore, additional time would give the Pro Bono Liaison a meaningful time to obtain appointed counsel for Plaintiff. A 60-day

<sup>1</sup> The successor to Attorney General Jefferson B. Sessions III has been automatically substituted in the case caption.

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2 extension would give the parties up to and including February 15, 2019, in which to file their  
3 Discovery Plan / Scheduling Order.

4 Plaintiff has contacted Defendant's attorney via email, who has advised that she has no  
5 objections to Plaintiff's request. Plaintiff seeks this extension request in good faith and not for  
6 the purpose of delay.  
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Dated this 4th day of December 2018.  
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9 DRÉE ANN CELLEMME  
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DAYLE ELIESON  
UNITED STATES ATTORNEY  
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/s/ Drée Ann Cellemme \_\_\_\_\_  
12 DRÉE ANN CELLEMME  
PRO SE PLAINTIFF  
13 11035 Lavender Hill Drive,  
Suite 160-147  
14 Las Vegas, Nevada 89135  
15 (858) 243-6195

/s/ Holly A. Vance \_\_\_\_\_  
HOLLY A. VANCE  
ASSISTANT UNITED STATES ATTORNEY  
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IT IS SO ORDERED.  
17 DATED: December 6, 2018

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19 C.W. HOFFMAN, JR.  
20 UNITED STATES MAGISTRATE JUDGE  
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